

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
BNP PARIBAS SA; BNP PARIBAS NORTH	)	
AMERICA; BNP PARIBAS HOUSTON	)	Civil Action No. 4:11cv3718
AGENCY; and JOVENAL MIRANDA CRUZ,	)	
	)	
Defendants.	)	
	)	

**ASSENT MOTION BY THE UNITED STATES FOR DISMISSAL, WITHOUT  
PREJUDICE, OF DEFENDANT JOVENAL MIRANDA CRUZ**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), and with the assent of Defendant Jovenal Miranda Cruz, the United States hereby moves for an order of dismissal, without prejudice, of defendant Jovenal Miranda Cruz. The United States and Cruz agree that each will bear its own costs, expenses and attorneys' fees in the above-captioned matter.

Wherefore, the United States requests that the Court enter an order dismissing this matter without prejudice as to defendant Jovenal Miranda Cruz. A Proposed Order is filed simultaneously herewith.

Dated: August 13, 2014

Respectfully submitted,

**Attorneys for United States of America**

STUART F. DELERY  
Assistant Attorney General

By: /s/ Linda M. McMahon

Michael D. Granston  
Michal Tingle  
Linda M. McMahon  
Donald Williamson  
Samuel J. Buffone, Jr.  
Elizabeth Young

U.S. Department of Justice  
Civil Division  
P. O. Box 261  
Ben Franklin Station  
Washington, D.C. 20044  
(202) 616-2945

Email: [linda.mcmahon2@usdoj.gov](mailto:linda.mcmahon2@usdoj.gov)

Email: [don.williamson@usdoj.gov](mailto:don.williamson@usdoj.gov)

Email: [samuel.j.buffone@usdoj.gov](mailto:samuel.j.buffone@usdoj.gov)

Email: [elizabeth.young@usdoj.gov](mailto:elizabeth.young@usdoj.gov)

**CERTIFICATE OF SERVICE**

On the 13th day of August, 2014, a copy of the United States' Assent Motion to Dismiss Jovenal Miranda Cruz, without prejudice, was filed electronically using the Court's Electronic Case Filing System. Notice of this filing was sent electronically to counsel of record using the Court's electronic notification system. Parties may access this filing through the Court's Electronic Case Filing System.

/s/ Linda M. McMahon.  
Linda M. McMahon